

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:
Track One Cases

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DECLARATION OF STEVEN A. REED

Pursuant to 28 U.S.C. § 1746, I, Steven A. Reed, hereby declare as follows:

1. I am a partner in the Philadelphia, Pennsylvania office of Morgan, Lewis & Bockius LLP, counsel for Defendants Watson Laboratories, Inc., Actavis LLC, Actavis Pharma, Inc. *f/k/a* Watson Pharma, Inc., Warner Chilcott Company, LLC, Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. *f/k/a* Watson Laboratories, Inc.-Salt Lake City, and Actavis Laboratories FL, Inc., *f/k/a* Watson Laboratories, Inc.-Florida (collectively, the “Actavis Generic Defendants”), and Teva Pharmaceuticals USA, Inc. (“Teva USA”).

2. I submit this declaration in support of the Generic Manufacturers’ Reply Memorandum in Support of Their Motion For Partial Summary Judgment for the purpose of transmitting to the Court true and correct copies of the documents attached hereto.

3. Attached as Exhibit A is a true and correct copy of excerpted language from the January 19, 2019 deposition of Jinping McCormick.

4. Attached as Exhibit B is a true and correct copy of excerpted language from the August 2, 2018 deposition of Jennifer Altier.

5. Attached as Exhibit C is a true and correct copy of excerpted language from the January 17, 2019 deposition of Douglas Boothe.

6. Attached as Exhibit D is a true and correct copy of the prescribing information for fentanyl transdermal system, which was produced in the above-captioned case and assigned Bates number Aquired_Actavis_00655914.

7. Attached as Exhibit E is a true and correct copy of an Allergan press release dated November 10, 2011, available at <https://www.allergan.com/news/news/thomson-reuters/watson-launches-generic-kadian-r>

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 16th day of August 2019.

/s/ Steven A. Reed

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